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8  
9 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. *2011-374*

12 **JULIE ADKINS, a.k.a. JULIE ANN**  
13 **ADKINS, a.k.a. JULIE ANN CLANCY**  
14 **1431 Centerpoint Boulevard, Suite 110**  
**Knoxville, TN 37932**  
15 **Registered Nurse License No. 696823**

**A C C U S A T I O N**

16 Respondent.

17  
18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
21 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department  
22 of Consumer Affairs.

23 2. On or about February 7, 2007, the Board of Registered Nursing issued Registered  
24 Nurse License Number 696823 to Julie Adkins, also known as Julie Ann Adkins, also known as  
25 Julie Ann Clancy (Respondent). The Registered Nurse License was in full force and effect at all  
26 times relevant to the charges brought in this Accusation and will expire on December 31, 2010,  
27 unless renewed.  
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1 DRUGS

2 8. "Soma" is a dangerous drug pursuant to Code section 4022. Soma is a trade name  
3 for the substance Carisoprodol.

4 COST RECOVERY

5 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
6 administrative law judge to direct a licensee found to have committed a violation or violations of  
7 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
8 enforcement of the case.

9 FIRST CAUSE FOR DISCIPLINE

10 **(Unprofessional Conduct – May 31, 2007 Tennessee Consent Order)**  
11 **(Bus. & Prof. Code §2761(a)(4))**

12 10. Respondent has subjected her registered nurse license to disciplinary action under  
13 Code section 2761, subdivision (a)(4) in that on or about May 31, 2007, in a disciplinary action  
14 before the State of Tennessee Department of Health, Board of Nursing (Tennessee Board), Case  
15 Number 200502058, the Tennessee Board entered a Consent Order ordering that Respondent's  
16 registered nurse license be probated. The Consent Order also required Respondent to: (1) be  
17 evaluated by the Tennessee Professional Assistance Program (TNPAP); (2) if the evaluation  
18 recommended a contract with TNPAP, sign a contract and follow any recommendations of  
19 TNPAP; (3) if a contract with TNPAP was recommended, have her license probated concurrently  
20 with the TNPAP contract; (4) if a contract with TNPAP was not required, have her license  
21 probated for a minimum of three years; (5) while on probation, provide quarterly self reports;  
22 (6) while on probation, provide quarterly employer reports; and (7) while on probation, limit her  
23 practice of nursing to Tennessee and not practice in any party state without prior authorization  
24 from both the State of Tennessee and the other party-state boards.

25 11. The underlying conduct supporting the Tennessee Board's disciplinary action is that  
26 in or about 2005, while employed by St. Mary's Ambulatory Surgery Center in Knoxville,  
27 Tennessee, Respondent admitted that she wrote several fraudulent prescriptions for narcotics  
28 using a doctor's name and his Drug Enforcement Administration number. On or about June 7,

1 2006, Respondent was convicted of simple possession of a controlled substance and possession of  
2 soma in the Criminal Court of Knox County, Tennessee. Respondent's sentence was suspended  
3 upon payment of a fine and costs, and Respondent was placed on unsupervised probation.

4 SECOND CAUSE FOR DISCIPLINE

5 **(Unprofessional Conduct – April 7, 2009 Pennsylvania Final Adjudication and Order)**  
6 **(Bus. & Prof. Code §2761(a)(4))**

7 12. Complainant realleges the allegations contained in paragraphs 10 and 11 above, and  
8 incorporates them by reference as if fully set forth here.

9 13. Respondent has subjected her registered nurse license to disciplinary action under  
10 Code section 2761(a)(4) in that on or about April 7, 2009, in a disciplinary action before the  
11 Commonwealth of Pennsylvania State Board of Nursing (Pennsylvania Board), Docket Number  
12 2256-51-07, File Number 07-51-10304, the Pennsylvania Board entered a Final Adjudication and  
13 Order denying Respondent's application for licensure by endorsement/temporary practice permit.

14 14. The underlying conduct supporting the Pennsylvania Board's disciplinary action is  
15 that on or about October 18, 2006, Respondent submitted an application for licensure by  
16 endorsement/temporary practice permit (application) to the Pennsylvania Board. In her  
17 application, Respondent admitted that she had been convicted of simple possession of a Schedule  
18 III controlled substance in the Criminal Court of Knox County, Tennessee. Respondent also  
19 admitted that she wrote fraudulent prescriptions for narcotics using a doctor's name while  
20 employed by St. Mary's Ambulatory Surgery Center in Knoxville, Tennessee. Pursuant to the  
21 Consent Agreement entered by the Tennessee Board on or about May 31, 2007, Respondent  
22 entered a three-year probationary agreement with the TNPAP.

23 15. By letter dated September 20, 2007, the Pennsylvania Board notified Respondent that  
24 her application was denied due to her guilty plea relating to narcotics possession and her prior  
25 discipline by the Tennessee Board. The Pennsylvania Board did not receive a request for a  
26 hearing from Respondent, and on or about November 7, 2007, the Pennsylvania Board entered a  
27 Final Order denying Respondent's application. On or about August 11, 2008, the Pennsylvania  
28 Board issued an Order Vacating the Final Order and re-opening Respondent's file because

1 Respondent never received the Tennessee Board's provisional denial of her application or the  
2 Tennessee Board's Final Order. On or about January 28, 2009, a formal hearing was held on the  
3 matter of Respondent's application. Respondent testified on her own behalf via telephone. After  
4 reviewing the record from the formal hearing, the Pennsylvania Board concluded that Respondent  
5 did not possess the qualities necessary to practice as a professional nurse, and entered the Final  
6 Adjudication and Order denying her Application.

7 PRAYER

8 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this  
9 Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

- 10 1. Revoking or suspending Registered Nurse License Number 696823, issued to Julie  
11 Adkins, also known as Julie Ann Adkins, also known as Julie Ann Clancy;  
12 2. Ordering Julie Adkins, also known as Julie Ann Adkins, also known as Julie Ann  
13 Clancy to pay the Board of Registered Nursing the reasonable costs of the investigation and  
14 enforcement of this case, pursuant to Business and Professions Code section 125.3;  
15 3. Taking such other and further action as deemed necessary and proper.

16  
17 DATED: October 25, 2010

18 Louise R. Bailey  
19 LOUISE R. BAILEY, M.ED., RN  
20 Interim Executive Officer  
21 Board of Registered Nursing  
22 Department of Consumer Affairs  
23 State of California  
24 Complainant

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